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HELEN JEAN SINGH

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

HELEN JEAN SINGH,

Defendant.

Case No.: CR 4-11-71127 MAG (LB)

**STIPULATION AND [PROPOSED] ORDER RE
CONTINUANCE OF STATUS CONFERENCE TO
DECEMBER 8, 2011 AND WAIVER OF TIME FOR
PRELIMINARY HEARING DATE AND
EXCLUSION OF TIME UNDER THE SPEEDY
TRIAL ACT**

On November 2, 2011, the parties appeared before the Court for a detention hearing. At the conclusion of the hearing, Ms. Singh was released from custody under certain terms and conditions and a status conference was set for December 2, 2011.

Ms. Singh's counsel is unavailable on December 2, 2011, due to his travel out of the jurisdiction on another matter. As such, the parties request and stipulate that the Court continue Ms. Singh's status conference to December 8, 2011, at 9:30 a.m.

In continuing the matter to December 8, 2011, Ms. Singh waives time for a preliminary hearing under Federal Rule of Criminal Procedure 5.1(c). Ms. Singh has previously waived her

1 right to a preliminary hearing and the parties agree that – taking into account the public interest
2 in the prompt disposition of criminal cases – good cause exists for this extension.

3 The parties also stipulate and move the Court for an Order excluding time under the
4 Speedy Trial Act, 18 U.S.C. § 3161(b), through December 8, 2011. The parties previously
5 agreed to toll and to waive time, for purposes of the Speedy Trial Act, through December 2,
6 2011. The parties agree and stipulate that the delay resulting from this continuance serves the
7 ends of justice and that such action outweighs the best interest of the public and the defendant
8 in a speedy trial. Defense counsel continues to investigate this case and review pre-indictment
9 discovery. The parties therefore stipulate that an exclusion of time under the Speedy Trial Act
10 for continuity of counsel and effective preparation of counsel is warranted pursuant to 18
11 U.S.C. § 3161(h)(7)(A) and (B)(iv).

12 SO STIPULATED.

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14 Dated: November 29, 2011

_____/S/_____
EDWIN PRATHER
Counsel for HELEN JEAN SINGH

MELINDA HAAG
United States Attorney

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20 Dated: November 29, 2011

_____/S/_____
ANDREW HUANG
Assistant United States Attorney

[PROPOSED] ORDER

GOOD CAUSE APPEARING and per the parties' stipulation, the status conference in this case is continued to December 8, 2011, at 9:30 a.m.

The Court finds that based on the record and the stipulation above, that the continue of the status conference to December 8, 2011, serves the ends of justice and that such action outweighs the best interest of the public and the defendant in a speedy trial. Specifically, the Court finds that denying such a continuance would deny the defendant of continuity of counsel and deny defense counsel reasonable time for effective preparation, taking into account the exercise of due diligence. Therefore, the period of time between December 2, 2011, and December 8, 2011, shall be excluded for Speedy Trial Act purposes.

IT IS SO ORDERED.

Dated: November 30, 2011



THE HONORABLE LAUREL BEELER
U.S. MAGISTRATE JUDGE